



May 27, 2005

HAND-DELIVERED

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02110

Re: Investigation by the Department of Telecommunications
And Energy on its own motion, pursuant to G.L. c. 164
§ 94 and 220 C.M.R. §§ 5.00 et seq. as to the propriety
of the rates and charges set forth in the following tariffs:
M.D.T.E. Nos. 34 through 68, filed with the Department
on April 27, 2005 by Bay State Gas Company

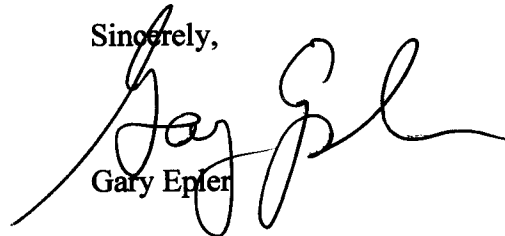
D.T.E. 05-27

Dear Secretary Cottrell:

Enclosed for filing, please find an original and nine (9) copies of the
Petition for Limited Participation Status filed on behalf of Fitchburg Gas and
Electric Light Company d/b/a "Unitil" ("Unitil") in the above-referenced
docket.

Thank you for your attention to this matter.

Sincerely,



Gary Epler

Enclosure

cc: Caroline M. Bulger, Hearing Officer, MDTE
Patricia M. French, Esq.

Gary Epler
Senior Counsel

6 Liberty Lane West
Hampton, NH 03842-1720

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**COMMONWEALTH OF MASSACHUSETTS
BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications
And Energy on its own motion, pursuant to G.L. c. 164
§ 94 and 220 C.M.R. §§ 5.00 et seq. as to the propriety
of the rates and charges set forth in the following tariffs:
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D.T.E. 05-27

Bay State Gas Company

**FITCHBURG GAS AND ELECTRIC LIGHT COMPANY'S
PETITION FOR LIMITED PARTICIPATION STATUS**

Fitchburg Gas and Electric Light Company d/b/a "Unitil" ("Unitil" or the "Company") submits its petition to the Department of Telecommunications and Energy ("Department") for limited participation status in the above captioned proceeding, pursuant to 220 C.M.R. 1.03(1)(e). In support of its petition, the Company states:

1. Unitil is a "Gas Company" as defined in G.L. c. 164 § 1 and a "Local Distribution Company" as defined in 220 CMR §14.02, and, pursuant to 220 CMR § 14.03(2), has the exclusive obligation to provide Distribution Service to all customers within its service territory.
2. On April 27, 2005, Bay State Gas Company filed a petition with the Department for approval of a \$22.2 million increase in its base rates for firm gas customers.
3. The Department has issued an Order of Notice in this proceeding stating that any person wishing to participate must file a petition with the Department by May 27, 2005.
4. In conducting adjudicatory hearings, the Department may "allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose, as the agency may order." See G.L. c. 30A, § 10; 220 CMR 1.03(1)(b).
5. As a local distribution company providing service to customers in Massachusetts, Unitil submits that it may be substantially and specifically affected by any decision of the Department in this proceeding. Issues raised and decided in this

proceeding may become applicable to Unitil in a subsequent proceeding. Unitil submits that no other party can adequately represent Unitil in this proceeding.

6. Unitil submits that its participation in this proceeding as a limited participant will not administratively burden the process.
7. Unitil requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to:

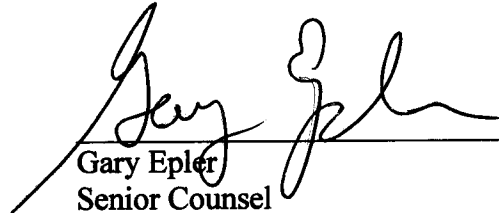
Gary Epler
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epler@unitil.com

On the basis of the foregoing, Unitil respectfully requests leave to participate in the above captioned proceeding as a limited participant.

Respectfully submitted,

**FITCHBURG GAS AND ELECTRIC
LIGHT COMPANY**

By Its Attorney,



Gary Epler
Senior Counsel
Unitil Service Corp.
6 Liberty Lane West
Hampton, NH 03842

Date: May 27, 2005

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was sent this 27th of May, 2005, by First Class U.S. Mail to the following parties:

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